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*Attorneys for Plaintiff
Goyard St-Honore*

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

GOYARD ST-HONORE, a French
Corporation,

Plaintiff,

v.

S2, INC., a Delaware Corporation;
SURGEON WORLDWIDE INC., a
Delaware Corporation; DOMINIC
CHAMBRONE aka DOMINIC
CIAMBRONE, an individual; and DOES
1-10, inclusive,

Defendants.

Case No. 2:24-cv-04903-RGK-MRW

**NOTICE OF SETTLEMENT AND
REQUEST TO VACATE UPCOMING
DEADLINES**

TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that plaintiff Goyard St-Honore's ("Plaintiff" or "Goyard") and defendants S2, Inc., Surgeon Worldwide Inc., and Dominic Chambrone's ("Defendants"), have come to an agreement to settle the instant action with regard to all claims alleged against Defendants. The Parties have begun discussing an initial draft of a confidential settlement agreement. The Parties anticipate that a settlement agreement will be finalized and a dismissal will be filed within 30 days. The Parties therefore request that the Court vacate all upcoming deadlines and hearings until

1 the Parties desire to reopen the action should it become necessary or until the dismissal
2 is filed.

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4 Dated: December 20, 2024

BLAKELY LAW GROUP

5 By: /s/ Tara A. Currie
6 Brent H. Blakely
7 Tara A. Currie
8 *Attorneys for Plaintiff*
9 *Goyard St-Honore*

10 Dated: December 20, 2024

RUTAN & TUCKER, LLP

11 By: /s/ Meredith L. Williams
12 Michael D. Adams
13 Meredith L. Williams
14 *Attorneys for Defendants*
15 *Surgeon Worldwide Inc.; and*
16 *Dominic Chambrone aka*
17 *Dominic Ciambrone*

18
19 **ATTESTATION RE ELECTRONIC SIGNATURES**

20 I attest that all other signatories listed, and on whose behalf the filing is
21 submitted, concur in the filing's content, and have authorized the filing.

22 Dated: December 20, 2024

23 By: /s/ Tara A. Currie
24 Tara A. Currie
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